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*Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

ABBEY DENTAL CENTER, INC., a Nevada  
 Corporation,

Plaintiff,

vs.

CONSUMER OPINION LLC, a Nevada  
 Limited liability company; DOES 1-10; and  
 ROE ENTITIES 1-10, inclusive,

Defendant(s).

Case No. 2:15-cv-02069-GMN-PAL

**STIPULATION AND (PROPOSED)  
 ORDER TO STAY PROCEEDINGS  
 (6th Request)**

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION  
 LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as  
 follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations in  
 regards to the instant matter.
2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter  
 for thirty (30) days, in order to allow the parties to facilitate settlement.
3. The Court entered the parties' stipulation as an Order on January 14, 2016. [ECF  
 No. 7]

1           4.     The Court's Order was due to expire on February 5, 2016.

2           5.     Due to continuing settlement discussion, the parties stipulated to stay the matter  
3 for a second time on February 3, 2016.

4           6.     The Court entered the parties' second stipulation as an Order on February 9,  
5 2016. [ECF No. 9]

6           7.     Due to continuing settlement discussion, the parties stipulated to stay the matter  
7 for a third time on March 3, 2016.

8           8.     The Court entered the parties' third stipulation as an Order on April 7, 2016.  
9 [ECF No. 12]

10          9.     Due to continuing settlement discussion, the parties stipulated to stay the matter  
11 for a fourth time on April 7, 2016.

12          10.    The Court entered the parties' fourth stipulation as an Order on April 20, 2016.  
13 [ECF No. 14]

14          11.    Due to continuing settlement discussion, the parties stipulated to stay the matter  
15 for a fifth time on May 10, 2016.

16          12.    The Court entered the parties' fifth stipulation as an Order on May 16, 2016.  
17 [ECF No. 16]

18          13.    The parties continue to engage in productive settlement discussion. As part of  
19 their ongoing discussion, the parties have been negotiating language to be included in the  
20 parties' settlement agreement. Coming to an agreement on the appropriate language for  
21 inclusion has caused delays in the parties' negotiation efforts, as the conclusion will impact  
22 future litigation. Accordingly, in order to facilitate those efforts, as well as to minimize  
23 attorneys' fees and other legal expenses, the parties believe that the present civil action should  
be stayed for an additional sixty (60) days.

          14.    Therefore, the parties agree that the Court may enter the following Order and  
request that the Court do so accordingly:

a. Except as otherwise provided below, this action shall be stayed for a period of sixty (60) days from the date this stipulation is filed with the Court.

b. The stay shall immediately terminate upon Plaintiff's filing with the Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's complaint in this action or otherwise respond to same in accordance with the *Federal Rules of Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

c. The parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

**SO STIPULATED AND AGREED** on this 9th day of June, 2016.

**THE AMIN LAW GROUP NV, LTD.**

**RANDAZZA LEGAL GROUP, PLLC**

/s/Ismail Amin, Esq.

/s/ Marc J. Randazza, Esq.

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*Attorney for Plaintiff*

*Attorney for Defendant*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated: June 16, 2016

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 9<sup>th</sup> of June, 2016, I served a true and correct copy of:  
**STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (6<sup>th</sup> Request),**  
postage fully prepaid and addressed to the following:

\_\_\_\_\_ serving the following parties via US Mail, postage prepaid;

  X   serving the following parties via CM/ECF;

\_\_\_\_\_ serving the following parties via facsimile;

\_\_\_\_\_ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.  
3625 South Town Center Drive  
Las Vegas, NV 89135  
***Attorney for Defendant***

      /s/ Daniella Flandez        
Daniella Flandez  
An Employee of THE AMIN LAW GROUP, NV., LTD.

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